

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

FILED
IN CLERKS OFFICE
JAN 5 PM 5 18

UNITED STATES OF AMERICA)

v.)

DZHOKHAR A. TSARNAEV,)
Defendant)

U.S. DISTRICT COURT
DISTRICT OF MASS.
Crim No.13-10200-GAO

FILED UNDER SEAL

**GOVERNMENT'S MOTION FOR LEAVE TO FILE
NOTICE OF CRIMES, WRONGS AND OTHER ACTS UNDER SEAL**

The United States of America, by and through its undersigned counsel, respectfully requests leave to file the attached Notice of Crimes, Wrongs and Other Acts under seal. As grounds for this motion, the government states that the attached notice contains sensitive non-public information about evidence to be presented in the upcoming trial in the matter, pre-mature disclosure of which could be contrary to the interests of justice.

Respectfully submitted,

CARMEN M. ORTIZ
United States Attorney

By: /s/ Alope Chakravarty
ALOE S. CHAKRAVARTY
WILLIAM D. WEINREB
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Assistant U.S. Attorneys

CERTIFICATE OF SERVICE

I hereby certify that this document will be served via electronic mail to Judy Clarke, Esq., counsel for Dzhokhar Tsarnaev, on January 5, 2015.

/s/ Alope Chakravarty
ALOE CHAKRAVARTY